**OBJECTION DEADLINE: JUNE 15, 2009** 

WOLLMUTH MAHER & DEUTSCH LLP James N. Lawlor One Gateway Center, Ninth Floor Newark, New Jersey 07102 - and -500 Fifth Avenue New York, New York 10110 Tel: (973) 733-9200

Tel: (9/3) /33-9200 Fax: (973) 733-9292 jlawlor@wmd-law.com

Counsel for Saginaw LLC and Brazing Concepts LLC

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	:	
In re	:	Chapter 11 Case No.
	:	
GENERAL MOTORS CORP., et al.,	:	09-50026 (REG)

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Debtors. : (Jointly Administered)

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LIMITED OBJECTION AS TO CURE AMOUNTS BY SAGINAW LLC AND BRAZING CONCEPTS LLC IN RESPONSE TO NOTICE OF (I) DEBTORS' INTENT TO ASSUME ANDASSIGN CERTAIN EXECUTORY CONTRACTS, UNEXPIRED LEASES OF PERSONAL PROPERTY AND UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY AND (II) CURE AMOUNTS RELATED THERETO

Saginaw LLC and Brazing Concepts LLC (collectively, the "Objectors"), identified by the above-captioned debtors (the "Debtors") as GSO Capital Partners LP, by and through their undersigned counsel, hereby submit this limited objection to the "Cure Amounts" as defined in the Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto dated June 5, 2009, and respectfully represent as follows:

## **LIMITED OBJECTION**

- 1. Upon information and belief, the Debtors have identified certain amounts due the Objectors as Cure Amounts, which alleged amounts total \$311,665.61, as set forth on annexed Exhibit A.
- 2. The Objectors believe that the Debtors omitted approximately eleven (11) additional unpaid amounts due totaling \$94,217 from Exhibit A. The missing invoices are identified on annexed Exhibit B.
- 3. The Objectors therefore assert a total Cure Amount of \$405,882.75 is due and owing.

## **CONCLUSION**

WHEREFORE, the Objectors request that the Court determine that the Cure Amount due the Objectors is \$405,882.75 and grant such other relief as is equitable and just.

Dated: New York, New York June 15, 2009

WOLLMUTH MAHER & DEUTSCH LLP

By:/s/ James N. Lawlor

James N. Lawlor One Gateway Center, Ninth Floor Newark, New Jersey 07102 - and -500 Fifth Avenue New York, New York 10110

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